



KAISER ♦ HILL  
COMPANY

## MEMORANDUM

Date: April 24, 2002

To: Jan Robbins

From: Pam Arnold

Minutes are unclassified and  
NOT UCNI: *[Signature]*

Subject: WEEKLY STATUS MEETING DOE/LRA for April 24, 2002

Attached are the minutes for the referenced weekly meeting for the Operating Record.  
In attendance were:

R. Ahlstrand	J. Floerke	J. Hindman	K. Kunert	M. McGrory	D. Ward
P. Arnold	M. Hesar	L. Langlois	J. Long	D. Onyskiw	

In addition to the attached status, the following was discussed:

1. Action Items were reviewed from last week's minutes. Items 4, 6 and 7 were completed; items 1 (revised), 2, 3, and 5 will be carried over until completed.
2. Hindman and Hesar discussed Action Item number 3 below. Hesar recalled that one notification had been given from the Site that serves as notification for all future such studies. An informal curtsey notification to the LRA with no time frame is offered for such studies. Hindman will confirm.
3. Arnold presented a revised Berm removal form for the berm into room 2207E. Hindman agreed that the additional information was satisfactory and the berm could be removed. Arnold offered that an E-mail from the Fire Protection officer would be included with the package and the berm would not be removed until such approval was received.
4. Arnold proposed field modification number 2 for approval. Ahlstrand asked that the submittal to CDPHE wait until Gerdeman is present at the meeting.

### ACTION ITEMS FROM THIS MEETING: (to be included in next week's agenda)

1. McGrory is to indicate when Tanks T231A & B are scheduled for sludge removal, which is dependent on resolution of technical issues by Material Stewardship. (carry over from 2/13/02 and revised 4/24/02)
2. Arnold is to advise Hindman when the Nevada Department of Health is expected on Site to view gloveboxes with leaded windows. (this is for the purpose of gaining approval to dispose of GBs with leaded windows at NTS) (carried over from 4/17/02)
3. Hindman will see whether or not it is possible to reduce or eliminate the 45-day notification required to perform a treatability study. (carried over from 4/17/02)
4. Gerdeman will investigate the requirements for revising the DOP when field modifications are approved. (carried over from 4/17/02)
5. Arnold is to establish a schedule to hold one per month of the weekly meetings in the back area as a walk-down of current D&D activities. The walk-down meetings will begin as usual in the B371 CR as a pre-evolutionary briefing. The first such walk-down meeting will be 5/1/02.

End

1/14  
371/4 Project  
WEEKLY STATUS MEETING DOE/LRA for April 24, 2002



B371-A-000084

**B371 CLOSURE PROJECT**  
**WEEKLY STATUS MEETING**

*Every Wednesday, 9:30 a.m.*

*B371 Conference Room*

**April 24, 2002**

**AGENDA**

**INTRODUCTION** – Pam Arnold, X6035, Pager 303-212-4835

**D&D**

**Presenters** – Jim Floerke, X2850, Pager 303-212-3292 & Mike McGrory, X5100, Pager 303-212-2146

- B374 Deactivation
- EM50 Funded Activities
- Liquids Draining
- Tank Deactivation
- Glovebox Deactivation
- Set 9 CSV and Set 12 Glovebox Removal
- Cerium Nitrate
- MAA/PA Closure
- Breathing Air
- Misc. D&D Status
- Sets 7, 21, and 14 Status

**ENVIRONMENTAL** – Pam Arnold, X6035, Pager 303-212-4835

**AUTHORIZATION BASIS/BIO** – John Almon x3217, Pager 303-212-3426

**ACTION ITEMS FROM LAST MEETING:**

1. McGrory is to indicate when the Tank T231A is scheduled for sludge removal, which is dependent on a sub-contractor selection and subsequent agreements. (carry over from 2/13/02)
2. Arnold is to advise Hindman when the Nevada Department of Health is expected on Site to view gloveboxes with leaded windows. (this is for the purpose of gaining approval to dispose of GBs with leaded windows at NTS)
3. Hindman will see whether or not it is possible to reduce or eliminate the 45-day notification required to perform a treatability study.
4. Arnold/Langlois will inventory the liquids stored in room 2207West for the purpose of gaining approval for a berm removal. In addition, the UIS for that unit will be modified to require that liquid bung drums stored in that unit be placed in a drip pan for secondary containment.
5. Gerdeman will investigate the requirements for revising the DOP when field modifications are approved.
6. Ward will provide an Operations Order to Hindman that describes SOE alarm monitoring in B374.

7. Arnold is to prepare a DOP field modification that will add gloveboxes 7 and 9, Set 14, room 2325 to the scope. These are old RCRA unit number 53, which was not included in the DOP.

**ACTION ITEMS FOR NEXT MEETING:**

**D&D Summary (AAC/AAD)  
Week Ending 4/19/02**

**B374 Deactivation**

- 231 sludge removal – Pumping sludge in progress.
- Tank Sludge Removal – The SOW is being reviewed by Clean Horizons.

**EM50 Funded Activities**

- **Active Projects:**
  - Tank Sludge Removal – See above.
  - SCO Assay Instrumentation – EM50 funding request has been verbally approved for \$29K. Instrument requisition was placed on 4/18 for 7 readouts and 50 probes.
- **Pending Projects:**
  - Remote SNM Measurement CSV – An on-site visit and initial walkdown of the B371 Central Storage Vault (CSV) was conducted by Shonka Research Associates (SRA) February 26-28. Following the walkdown, SRA issued a Concept Paper which proposed instrumentation capable of releasing the CSV from Safeguards Requirements, a key component of the MAA Closure Plan. In addition, the radiological instrumentation would be capable of providing the SCO measurements required for eventual dismantlement of the CSV and waste disposal. Currently, the contract structure is being considered and

3

drafted. B371 D&D will report if the contract is awarded and, at that time, apply for EM50 funding.

- Remote Area Decon CSV – Strategy meeting pending.
- Remote Dismantlement CSV – Strategy meeting pending.

### **Non-actinide Liquid Draining**

- Continuing to develop Set 6 strategy. (1AQ31DR02B)

### **Tanks**

- Set 13 cerium decon and D&D ready packages for 2307 and 2317 are ready-to-work. Tank 922A ring removal is complete and Tank 922B is in progress. The 2317 mechanical line isolation package is in process. The line isolation work package for 2319 is ready to work. (1AC113ET00)
- Set 15 (2223) mechanical and electrical isolation packages are working. Ring Removal package in pre-reqs. (1AC115AT00)

### **Gloveboxes**

- Planning GB deactivation as contingent work for the Waste Team.
- Working pre-reqs for Set 12. (1AC112EG00)

### **Set 9 (CSV) and Set 12 (Glovebox Removal)**

- I/O 8 Mods (1AC109HD00):
  - I/O 8 modification package Radiological Work Permits/ALARA review being finalized.
  - Guillotine door package PMT successful; in closure signature cycle.
  - I/O 8 drain line installation package pending installation of electrical conduit and handswitch.
  - Sprinkler (5) Removal Package is in development.
  - Jib Crane/Hoist Installation Package is in planning development.
  - EDP for Glovebox 70-A (material introduction box) completed and submitted to Central Document Control (CDC). Purchase requisition is under development.
- Glovebox Removal (1AD112BD01):
  - Lead removal is 100% complete.
  - Mechanical isolation package is in closeout.
  - Health Physics Vent Removal package pre-reqs complete.
  - Package for glovebox overheat removal is scheduled to work 4/23.
  - SCO surveys completed and Decon/Fixative efforts successful.
  - Glovebox stripout pending following completion of GBO Alarm Package.

### Cerium Nitrate

- The B371 CeN Tank Steam Delivery System remains in B774 where tanks are being decontaminated.
- JHA comments have been incorporated into the CeN decontamination procedure for gloveboxes (spray on/wipe off method) and the procedure is in PRC for final approval.

### MAA/PA Closure (1AC11PNN20)

- Comments from DOE Safeguards and Security have been incorporated into the Closure Plan. K-H Safeguards and Security continue to review the corrections and/or disposition of comments prior to scheduling the round table meetings with the DOE reviewers. The I&E activities will be the K-H Safeguards and Security priority until concluded in June.
- A schedule to prioritize holdup measurement scans is being developed.
- Identification of disposition paths for various orphan/rogue waste continues.
- Security Planning is formulating the logic and strategy for reducing the MAA to an area encompassing the PuSPS processing room and storage vault.
- The Operations Order to administratively control the walkdown and disposition of classified matter and prevent reintroduction of classified matter into the area is being developed.
- The SNM Holdup Inventory Application, an Access-based application for the tracking of holdup items and the corresponding assay measurements is complete. The Holdup Measurements Group is entering the scan data.

### Breathing Air Modification (1AD11BAJ40)

- Room 2103 electrical and mechanical modifications are in progress (ECR #6 is approved and has been incorporated for the S.O. test which started 4/15, and should complete by 4/23; ECR #2 is complete).

### Misc. D&D

- Area AQ Demolition (1AD1AQGX20):
  - Isolations by Steelworkers to begin 4/24.
  - KH Construction to start building scaffolding for asbestos removal on 4/29.
  - Lessons learned from B886 necessitate applying for a demolition permit after asbestos is remediated.
  - Mechanical engineering package for demolition of the UGST is signed off. Isolations to begin 4/24.
- Area AP Dismantlement (1AD1APBX00)
  - Room 3179 engineering is complete, will get packages ready, and work when craft personnel are available.
- Area AM Dismantlement [Rooms 4101, 4102, 4103 and 4104] (1AD1AMBX00)

- IWCP for the Electrical Isolations is with KH Construction. Intrusive walkdowns are 80% complete (5/7 projected completion).
- Operations started neutralizing tanks in Room 4104.
- IWCP for mechanical isolations walkdown is complete. Pre-reqs complete. Taps have been set and tested and initial LO/TO is complete.

#### **Set 7 Dismantlement (1AD107BD00)**

- Electrical dismantlement (Room 3305) is complete.
- Ancillary equipment mechanical isolation (Room 3305) is 85% complete.
- GB 75 removal is 100% complete.
- Working GB 38/37 internal equipment removal. Will start draining waterwalls and lead removal on GB 37 on 4/22. Internal equipment removal in GB 37 is 85% complete with the chainveyor left to remove.

#### **Set 21 Dismantlement (1AD421BD00)**

- Completed removal of plant air process water.
- Completed removal of Tank D845.
- Completed removal of cement conveyor.
- Started removal of 2 fiberglass tanks in the mezzanine.
- Will start brine water lines week of 4/22.

#### **Set 14 Dismantlement (1AD114BD00)**

- Lead removal package is complete.
- Electrical isolation is 85% complete.
- Draining of waterwalls, port covers and windows is 75% complete.
- Mechanical isolation package is 30% complete.
- Removal of glovebox contents is nearly complete in GB12. Working GB10.
- Alarm deactivation to begin on 4/23.
- Package for cold glovebox / cold tank went to KH Construction. IWCP package approved and in pre-reqs.

**ENVIRONMENTAL STATUS**  
**REGULATED ITEMS**

SET	AREA	RCRA UNIT DESCRIPTION	Unit #/Idle Equip. #	LOCATION	STATUS
	AM	Tanks: D2860, D206, D208, D211, D212, D213, D214, D216, D217, D251, D841, D837A, B, D383A, B, D849 A, B, D839A, B, D840A, B, D850		4101	Evaluating for Idle Equipment and inspection frequency
		Tanks: D-200, D-241, D-242, D-243, and Electric Motor/Pump		4103	
		Tanks: D261A, D261B, D253A, D253B, D254B, D223, D210, D204, D723, D224, D249, D203, D207, D256, D255, D306, D309		4103	
		Tanks: D261A, D261B, D253A, D253B, D254B, D223, D210, D204, D723, D224, D249, D203, D207, D256, D255, D306, D309		4104	
		Tank D250	IE: 371-01	4104	Contains approximately 200 gallons of HNO3 7.5 N + 1% H2SO4. Greater than 1% of volume; remaining liquid is RCRA waste.
		Tank D254A	IE: 371-02	4104	Contains approximately 1-2 gallons of 12 N HNO3. Less than 1% of volume; remaining liquid waste is CERCLA.
		Tank D205	IE: 371-03	4104	Contains approximately 100 gallons of .35 N HNO3. Greater than 1% of volume; remaining liquid is RCRA waste.
		Glovebox, Pumps, Motors, Piping	N/A	4104	Evaluated and will not be included in the IE inventory
3		Tanks: D132A, B, and C	MRT	3517	Raschig Rings removed from Tank D132A, B & C. No visible sludge or rings remaining; these tanks will be closed pursuant to "Unit Removal without On-Site Treatment" (Section 5.1.3, Component Removal RSOP) and dispositioned as non-hazardous waste.
		Tanks: D64 D65	N/A	3517	Raschig Rings removed from Tanks D64 and D65. No visible sludge or rings remaining; these tanks will be closed pursuant to "Unit Removal without On-Site Treatment" (Section 5.1.3, Component Removal RSOP) and dispositioned as non-hazardous waste.
		Nitric Acid Recirc. pump 31-11, P-28A	IE: 0049	3517	
		Nitric Acid Recirc pump 31-11, P28B	IE: 0050	3517	
		Nitric Acid Recirc pump 31-11, P29A	IE: 0051	3517	
		Nitric Acid Recirc pump 31-11, P29B	IE: 0052	3517	
		Nitric Acid pump 31-15, P63	IE: 0054	3517	
		Pumps P-28A, P-28B, P-29A, and P-29B	IE: 0107	3517	
		Pumps P-33A, P-33B, P-34A, P-34B	IE: 0109	3517	

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Revision 04/23/02

ENVIRONMENTAL STATUS - REGULATED UNITS, cont.

SET AREA	RCRA UNIT DESCRIPTION	Unit #/Idle Equip. #	LOCATION	STATUS
4	Tanks: D133, D150, D151, D152A, D152B	MRT	3571	Raschig Rings removed from Tanks D152A and D152B. No visible sludge or rings remaining; these tanks will be closed pursuant to "Unit Removal without On-Site Treatment" (Section 5.1.3, Component Removal RSOP) and dispositioned as non-hazardous waste.
	Ancillary Equipment: Evaporator-reboiler E-55, Evaporator Bottoms Cooler E-56, Condenser E-57, and Nitric Acid Feed Heat Exchanger E-62.	MRT	3571	
	Evaporator Bottoms Pump 31-18 P49A	IE: 0079	3571	
	Evaporator Bottoms Pump 31-18 P49B	IE: 0080	3571	
	Pumps 33 A&B, 34 A&B	IE: 0109	3571	
5	Tanks: D134A, D134B D134C, D135A, D135B, D289A, D289B, and D289C.	MRT	3573	Raschig Rings removed from all Tanks listed. No visible sludge or rings remaining; these tanks will be closed pursuant to "Unit Removal without On-Site Treatment" (Section 5.1.3, Component Removal RSOP) and dispositioned as non-hazardous waste.
7	Container Storage - Room	371.1A	3301	
	Mixed Residue Tank - Ancillary Equipment only	N/A	3303	
	Container Storage - Room	371.1A	3305	The container storage refers to 3 crated gloveboxes only. The first crated glovebox, X16534, has been removed and temporarily stored in room 3408 awaiting a cargo.
	Pumps: P171, P172, P173, P174, P175, P176, P177, P178, P179, P180	IE: 0122	3305	
	Mixed Residue Tank - Ancillary Equipment only	N/A	3305	
	Mixed Residue Piping in room 3305	MRT (ancillary equip.)	3305	Piping to be removed using the walls in the room as the boundary. The piping portion of the unit will be closed using Clean Closure Option #1 under the B371/4 DOP.
	Container Storage - Glovebox 37C	90.104	3305	
	Container Storage - Room	371.1A	3315	
	GB Storage - GB#32	371.1B	3315	
12	CWTS: GB 2401	371.3A	1105	

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ENVIRONMENTAL STATUS - REGULATED UNITS, cont.

SET AREA	RCRA UNIT DESCRIPTION	Unit #/Idle Equip. #	LOCATION	STATUS
12	CWTS: GB 2402, 2403	371.3A	1103	
	CWTS: GB 18, 23, 2404	371.3A	1115	
	CWTS: Tanks 2401A, B, C & D, 2402A & B, and 2403	371.3A	1103	
	Master process control and alarm panel	N/A	1113	
	Container Storage - Room	90.14	1111	Not currently in Permit - to be closed
	Container Storage - Room	90.19	1115	Not currently in Permit - to be closed
	Tanks: D-44A-1, D-44A-2, D-44A-4, D-44A-5, D-44A-6, D-44B-1, D-44B-2, D-44B-4, D-44B-5, D-44B-6	MRT	1107	
	Tanks: D-43A-1, D-43A-2, D-43A-3, D-43A-4, D-43A-5, D-43B-1, D-43B-2, D-43B-3, D-43B-4, D-43B-5	MRT	1109	
	Tanks: D-160A, B, D-400A, B, D, D-179	MRT	1115	
	Tanks: D-2A, B, D-157A, B, D-238A, B, D-240A, B, D-170, D-171	MRT	1117	
	Tanks: D-293A & B	MRT	1127	Need to remove RRs and evaluate for Idle Equipment
	Tanks: Utility Scrubbers D131A & B		1105	
	Container Storage - Room	371.1A	1103	
	Vault Container Storage	371.1C	1101	
	Wash Liquid Pump 31-17, P-182	IE: 0008	1117	
	HAS Waste Pump 34-04, P4B, Tank D4B from E9, T10 to 2, D811	IE: 0009	1117	
	HAS Waste Pump 34-04, P3A, Tank D3A, from E1, E80 to D811	IE: 0010	1117	
	HAS Waste Pump 34-04, P3B, Tank D3B, from E1, E80 to D811	IE: 0011	1117	
	HAS Waste Pump 34-04, P4A, Tank D4A, from E9-E10 to D2, D811	IE: 0012	1117	
	Pumps P-140, P-141A, P-141B	IE: 0113	1115	
	Pumps P-181 and P-182	IE: 0114	1117	
	Pumps P-5A, P-5B, P-6A, P-6B, P-7A, P-7B, P-15A, P-15B, P-27A, P-27B, P-107A, P-107B, JP-108A, P-108B	IE: 0115	1125	
13	Tank D-292A & B	MRT	2317	
	Tank D933	IE: 371-11	2317	

Continued to next page

Revision 04/23/02

ENVIRONMENTAL STATUS - REGULATED UNITS, cont.

SET AREA	RCRA UNIT DESCRIPTION	Unit #/Idle Equip. #	LOCATION	STATUS
13	Pumps P-21A, P-914	IE: 0117	2307	
	Pumps P-85A, B, C; P-27A, B, C	IE: 0119	2317	
	Tank D67, D277A/B, D912, D914, D916, D922 A/B		2317	Evaluating for Idle Equipment and inspection frequency
14	Container Storage - Room	371.1A	2325	
	GB's 7 & 9	53	2325	Old cementation process - RCRA unit
	Mixed Residue Piping in room 2325	MRT (ancillary equip.)	2325	Piping to be removed using the walls in the room as the boundary. The piping portion of the unit will be closed using Clean Closure Option #1 under the B371/4 DOP.
16	Container Storage - Room	90.71	3511	
	Tank D-70	IE: 0055	3521	Tank not listed in Table 3, DOP Set Descriptions
	Tanks T-23A, B, C, D	ID: 0104	3523	
	Tanks: T-11 A/B/C/D, T-12 A/B/C/D, T 13 A/B/C/D			Evaluating for Idle Equipment and inspection frequency
18	Tanks: D816, D817, D818, D819, D820, D821, D822, D823, D826A, D826B, D826C.	374.3	3801	
	See Set 19 also			
19	Tanks: D827, D830, D832, D834, D876, D879, T802, T803, T804, T805.	374.3	3810/4814	
	Tanks: D802A, B, C, D804A, B, C, D, D811A, B, D843, D852, D875, D847, D851.	374.3	2804	
18/19	Tanks: D806, D807A & B, D808, D843, D942.	374.3	2804/3801	
	Tanks: D801A, B, & C, D826C, D878, D883A & B, D884,	374.3	2804/3801/ 3803/3805/ 3809/3810/ 4802/4812	Tanks D883A/B have been declared RCRA Stable and transferred to D&D
	Spray Chamber W803, Spray Dryer Baghouse FL803	374.3	2804/3801/ 3803/3805/ 3809/3810/ 4802/4812	

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ENVIRONMENTAL STATUS - REGULATED UNITS, cont.

SET	AREA	RCRA UNIT DESCRIPTION	Unit #/Idle Equip. #	LOCATION	STATUS
19/21		Tanks: D824A & B, DD825 A & B, D844 A & B, D848	374.3	2804/3801/ 3803/3805/ 4805/4807	
19		Drum Filter Basins: FL802A & B, Sludge Dryer: W801, Dry Sludge Hopper: H3, Dry Sludge Conveyors: CV813A & B	374.3	2804/3801/ 3803/3805/ 4805/4807	
24		GB Storage - GB's 72B and 72C	371.1B	3408	GB's 72B and 72C have been closed by "Unit Removal in Conjunction with 'Debris Rule' Treatment".
		Mixed Residue Tank - Ancillary Equipment	N/A	3408	
56		Tanks: D806 and D807A/B, 808, 812, 813, 814, 815, Polishing Filter FL831	374.3	3801	Tanks D807A/B, D808, D813, D814, D815, and D816 have been declared RCRA Stable and transferred to D&D.
		GB Storage - GB's 107 and 113	374.3	3801	
57		No RCRA Units			
58		Tanks: D825A, D825B, D844A, D844B, D848	374.3	3803/4805/ 4807	Tanks: 825A, D825B, D844A, D844B, D848 have been declared RCRA Stable and transferred to D&D.
		Ancillary Equipment: FL802A, FL802B, W801, H3, CV813A, CB813B, CV808, CV812, CV813A/B, CV816, W801, H3, FL802A/B, T807, E804A/B/C, E817A/B, P806A/B, P815A/B, P816A/B, P862A/B.	374.3	3803/4805/ 4807	
		GB Treatment: GB's 115 AB, 116AB, 117AB, 118 AB.	374.3	3803/4805/ 4807	

# **Basis for Interim Operations (BIO)**

**Week Ending 04-19-02**

## **PuSPS Page Changes**

- Install TGA/IR in Room 3701
  - To PRC Tuesday, April 23, 2002

## **Operations Page Changes**

- Page change to incorporate all JCOs
  - Submitted to DOE Thursday, February 14, 2002
- Residue Product Carts
  - Approval on hold

## **BIO Update**

- Building 371/374 PHA
  - Draft completed 02-28-02

## **D&D Support**

- Out-of-commission - USQDs for placing dismantlement sets out-of-commission:

Set	Date Completed	Date to DOE	Response Due	Response/ Approval
<b>Pending</b>				
Process Vent, Sets 12/13	03-13-02	04-11-02	05-02-02*	
Caustic transfer line	04-01-02	04-15-02	04-30-02*	
56	04-03-02	04-15-02	05-02-02*	
58				
21, Ph. II				
3, 4, 5, 6, 16, & 17				
<b>Complete</b>				
24	09-27-01	10-01-01	10-08-01	10-01-01
7	10-24-01	10-30-01	11-06-01	11-06-01
14	11-13-01	11-28-01	12-05-01	12-05-01
13	12-13-01	12-18-01	12-25-01	01-30-02
21, Ph. I	12-11-01	01-15-02	01-22-02	01-29-02
12, Ph. 1	01-02-02	01-15-02	01-22-02	01-29-02
15	01-09-02	01-24-02	01-31-02	N/A
15	02-19-02	02-26-02	03-05-02	03-19-02
AM, Ph. 1	02-27-02	03-11-20	03-18-02	03-18-02
PWTS	Cancelled			

\* Dates negotiated with DOE as the need date for these OOCs.

**371/4 Project Berm Removal  
Evaluation**

Room # 2223/2207E Door(s) # 127/128(2207E) into RM 2223 Set # 15

Evaluator Name Randy Blain Employee # 514736 IWCP# T0109489

Liquid Storage: (List any potential liquid that could accumulate behind the berm)

Tank(s): D934 A, D934 B - Before Berm Removal, RR's will be removed and tanks verified empty.

Process Line(s): crit. drain line (plugged empty) process waste steam (already out-of-service)

Other Line(s): industrial waste (janitors sinks, lab. sinks) active fire sprinklers, chill water in 2207 W. Active

Container(s): 55-gallon drums - permitted storage for solids and liquids in 2207 W & 2223/2207 E.

Room Drain(s): None

Other Rooms (whose liquid would drain into this room): 2207 W

Air Flow Change(s)/Mitigation: Re-set SAANS - berm under door will remain in place - no door change needed.

Comments: Safety shower in Room 2223 to be removed.  
Crit. drain header remains in 2223, crit drain header, industrial waste, industrial cold water remains in 2207 E.

Mitigation for Berm Removal: All liquid drums in 2223 and 2207 E will be placed in pans; VHS will reflect. Berm between 2207 W and 2207 E will remain in place.

**371/4 Project Berm Removal**  
**Evaluation -- continued**

Justification for Berm Removal: Tanks removed, overhead process  
lines empty and/or removed. Liquid storage allowed  
in pans only in 2207E & 2223. Liquid storage in  
2207W remains bermed.

Notification to CDPHE:

Method: Weekly State Meeting w/ LRA Date: 4/24/02

Signatures:

Alan Arnold  
Environmental Management

4/24/02  
Date

Randy Blair  
Evaluator

7/25/02  
Date

**371/4 Project Berm Removal**  
**Process Steps**

1. Evaluator walk down the room for which the berm(s) is in place.
2. Evaluator note on the Evaluation Form any liquid source that has potential to accumulate behind the berm, including potential volumes and liquid chemistry.
3. Evaluator determine any air flow changes that will occur when the berm is removed and describe mitigation, if needed. (i.e., will there be a gap under the door that affects proper air flow?)
4. Fire Protection determine if there will be any affects to fire barriers - this approval signature will be captured on the IWCP.
5. Evaluator provide justification for removal of berm (i.e., why is it alright to eliminate the berm with respect to its originally intended need).
6. Evaluator complete the Evaluation form with room, door, Set, etc.
7. Environmental Management review and approve the completed form.
8. Environmental Management include completed form at next, regularly scheduled LRA meeting; discuss the berm removal at the meeting and include discussion in minutes for the Administrative Record.

Evaluator must be an SME with respect to liquids remaining in the Area.

Berms may not be removed prior to Completion of this form.